

P.N. 117-2204051

January 27, 2010

Mr. Joseph LeMay  
MA Superfund Section  
Remedial Project Manager  
USEPA - New England  
Five Post Office Square, Suite 100  
Boston, MA 02109-3912

**RE: Northeast Quadrant Vapor Intrusion Assessment Monitoring Well Locations  
Wells G&H Site, Woburn, MA**

Dear Joe,

Based on your written comments and our discussions at the January 21, 2010 meeting, Grace and UniFirst have revised the number and locations of proposed monitoring wells for the off-property Vapor Intrusion Assessment (VIA) Work Plan for the Northeast Quadrant of the Wells G&H Site. The revised well location map is attached and the rationale for the revised well locations follows. As we discussed at the meeting, locations for all the proposed new monitoring wells are approximate and may need to be adjusted based on utility locations and other field conditions.

Grace and UniFirst believe that the five new wells that we proposed to install in the Dewey Avenue neighborhood, together with the other wells proposed in the October 9, 2009 VIA Work Plan, were sufficient to evaluate the potential presence of volatile contaminants in the shallow groundwater in the neighborhood. The number and locations of the wells we proposed reflected our knowledge of the extensive scientific record already compiled concerning the history, geology, hydrology and groundwater chemistry at the Site and considered the distribution of the seven Dewey Avenue neighborhood well locations, and the rationale for those locations, that EPA proposed in the May 14, 2009 comment letter.

The five new Dewey Avenue neighborhood well locations proposed in the October 9, 2009 VIA Work Plan were selected to sample groundwater adjacent to the areas of the Grace and UniFirst properties where relatively high contaminant concentrations were historically detected and to provide spatial coverage within the Dewey Avenue neighborhood. We also proposed to include four existing wells located south of the Dewey Avenue neighborhood to provide

additional spatial coverage. Based on our January 21, 2010 discussions with you regarding the spatial distribution of wells in the Dewey Avenue neighborhood, Grace and UniFirst have added four additional wells within the Dewey Avenue neighborhood to those previously proposed. The attached map shows the locations of the wells which we now propose to install for purposes of the VIA – nine wells are located within the Dewey Avenue neighborhood and four are located outside the neighborhood.

The locations for the 13 new shallow groundwater wells to be installed for the VIA have been selected for the following reasons:

- UG8 Unchanged location from original VIA Work Plan. This location was selected to evaluate contaminant concentrations in shallow groundwater west of the UniFirst property.
- UG9 Unchanged location from the original VIA Work Plan. This location was selected to evaluate contaminant concentrations in shallow groundwater west of the UniFirst property.
- UG10 Unchanged location from the original VIA Work Plan. This location was selected to evaluate contaminant concentrations in shallow groundwater south of monitoring well S71S on the UniFirst property where relatively high contaminant concentrations were previously detected.
- UG11 The proposed location for well UG11 has been relocated westerly along Dewey Avenue as you requested.
- UG12 The proposed location for well UG12 has been relocated southerly along Wainwright Avenue as you requested.
- UG13 The proposed location for well UG13 has been relocated to the northwest corner of the Washington Street and Olympia Avenue intersection as you requested. As we discussed at the meeting, however, because of traffic considerations and the potential buried and overhead utilities in this area we expect it will be difficult to install a well at the proposed location, so the well may be relocated based on field conditions. If the proposed location needs to be moved, Grace and UniFirst will inform EPA prior to drilling the well.
- UG14 Unchanged location from the original VIA Work Plan. This location was selected to evaluate contaminant concentrations in shallow groundwater west of Grace monitoring well clusters G3 and G36 where relatively high contaminant concentrations were previously detected.
- UG15 The proposed location for well UG15 has been relocated westerly to the northwest corner of 2-36 Cummings Park building as you requested.
- UG16 Unchanged location from the original VIA Work Plan. This location was selected to evaluate contaminant concentrations in shallow groundwater south of Grace monitoring well cluster G24 where contaminant concentrations have not yet reached the cleanup goals.

UG17 This location has been added approximately 150 feet west of UG10 on the south side of Olympia Avenue. This well will provide a greater density of well locations south of the UniFirst property, as you requested.

UG18 This location has been added approximately 300 feet east of UG10 on the south side of Olympia Avenue. This well will provide a greater density of well locations south of the UniFirst property, as you requested.

UG19 This location has been added approximately 175 feet south of the Washington Street and Olympia Avenue intersection on the west side of Washington Street. This well will provide a greater density of well locations west of the Grace property, as you requested.

UG20 This location has been added on Dewey Avenue east of the intersection with Wainwright Avenue. This well will provide a greater density of well locations west of the Grace Property, as you requested.

In addition to adding and relocating the proposed wells described above, previously-installed monitoring wells S81S, S63S, GO1S, S21S, S22S, K55S and K60S will be sampled as part of the VIA if they can be located in the field and are acceptable for sampling based on the results of well integrity testing.

Once all of the VIA sampling locations are confirmed, Grace and UniFirst will provide to EPA a revised VIA Work Plan, a Quality Assurance Project Plan (QAPP) and responses to the EPA December 18, 2009 comments on the October 9, 2009 version of the VIA Work Plan.

Please contact Tim Cosgrave or Clayton Smith if you have any questions regarding the revised well locations or would like to set up a conference call with your team to discuss the contents of this letter.

Sincerely,

Jonathan R. Bridge  
Principal Hydrogeologist

CC: C. Lewis  
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NOTE: PROPERTY BOUNDARY INFORMATION IN THE DEWEY AVE. NEIGHBORHOOD FROM MAP TITLED "TAX MAP 26 OF THE CITY OF WOBURN MASSACHUSETTS" PREPARED BY THE CITY OF WOBURN ENGINEERING DEPARTMENT



### EXPLANATION

- APPROXIMATE PROPERTY BOUNDARIES DEWEY AVE. NEIGHBORHOOD
- RW10 ○ RECOVERY WELL LOCATION
- UC6 ○ MONITORING WELL LOCATION
- UG14 ● PROPOSED NEW WATER TABLE MONITORING WELL
- S81 ○ SHALLOWEST WELL AT EXISTING LOCATION PROPOSED FOR SAMPLING



TITLE: <b>MONITORING WELLS FOR VI ASSESSMENT</b>			
LOCATION: <b>Wells G &amp; H, Woburn, MA.</b>			
 <b>GeoTrans, Inc.</b> <small>A TETRA TECH COMPANY</small>	APPROVED	JRB	FIGURE <b>2-1</b>
	DRAFTED	RMK	
	PROJECT#	117-3008048	
DATE		JAN 2010	